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6 *Attorneys for the United States*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 RICHARD WHITTAKER,

12 Defendant.

Case No. 2:16-cr-00217-APG-EJY

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Eighth Request)

13
14 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
15 Frierson, United States Attorney, and Justin J. Washburne, Assistant United States
16 Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United
17 States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
18 Witt, Assistant Federal Public Defender, counsel for Richard Whittaker, that the Revocation
19 Hearing currently scheduled on April 2, 2024 at 9:30 a.m., be vacated and continued to June
20 4, 2024, or a date and time convenient to the Court, but no sooner than forty-five (45) days.

21 This Stipulation is entered into for the following reasons:

22 1. U.S. Probation Officer Tawnee Salem is unavailable to testify at the
23 revocation hearing scheduled for April 2, 2024, and she is the primary witness for the
24 government.

2. The parties expect the revocation hearing will be contested and will take approximately 4-6 hours.

3. The parties reached out to Chambers regarding potential dates that were available, and Chambers advised that the Court is available on June 4, 2024.

4. Defense counsel's expert witness, Dr. Jones-Forrester, has confirmed that she is available on June 4, 2024. However, Dr. Jones-Forrester advised that availability will be limited from June 5, 2024, through August 2024.

5. The parties agree to the continuance.

6. This is the eighth request for a continuance of the revocation hearing.

DATED this 28th day of March, 2024.

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/Jacquelyn N. Witt
JACQUELYN N. WITT
Assistant Federal Public Defender
Counsel for Defendant
RICHARD WHITTAKER

/s/Justin Washburne
JUSTIN J. WASHBURNE
Assistant United States Attorneys

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD WHITTAKER,

Defendant.

Case No. 2:16-cr-00217-APG-EJY

ORDER

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled on April 2, 2024 at the hour of 9:30 a.m., be vacated and continued to June 4, 2024 at the hour of 9:00 a.m. in Courtroom 6C..

DATED this 29th day of March, 2024.


HON. ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE